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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

15 ROBERT SINGER.

CASE NO. 2:19-cv-01579-JCM-BNW

Plaintiff,

**STIPULATION TO AMEND
SCHEDULING ORDER**

C. R. BARD, INC.; BARD PERIPHERAL
VASCULAR, INCORPORATED.

Defendants.

Plaintiff Robert Singer (“Plaintiff”) and Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants” and collectively with Plaintiff, the “Parties”), pursuant to Fed. R. Civ. P. 26(c) and (d) and LR IA 6-2, respectfully request that this Court amend its Order Granting Stipulation for Extension of Time, Dkt. 42 (“Scheduling Order”), as set forth below.

In June 2021, the Parties engaged in mediation in an attempt to resolve this case and those of six other plaintiffs represented by Plaintiff's counsel. Pending mediation, this case was stayed and the Parties refrained from conducting discovery. Mediation was unsuccessful, and the Parties must now resume and

1 complete additional fact discovery. The Parties therefore stipulate and request that this Court amend the
2 pretrial discovery deadlines set forth in the Scheduling Order, Dkt. 42, as follows (requested
3 modifications are **bolded**):

PROPOSED DATE	DEADLINE
October 19, 2021	Case-specific fact discovery closes with the exception of depositions of Plaintiff's disclosed family and friend witnesses and Defendants' applicable territory and district managers (which shall be taken no later than 30 days before trial is scheduled to begin) .
November 2, 2021	The Plaintiff shall produce case-specific expert reports.
December 8, 2021	The Defendants shall produce case-specific expert reports.
December 28, 2021	The Plaintiff shall produce any case-specific rebuttal expert reports.
January 24, 2022	The Defendants shall produce any rebuttal expert reports.
February 3, 2022	Deadline to depose the Plaintiff's case-specific experts.
March 10, 2022	Deadline to depose the Defendants' case-specific experts.
April 21, 2022	Deadline to file Daubert motions and other dispositive motions.

14 **IT IS SO STIPULATED.**

15 Dated this 1st day of July 2021.

16 WETHERALL GROUP, LTD.

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Counsel for Defendants

24 **IT IS SO ORDERED.**

25 
BRENDA WEKSLER

26 United States Magistrate Judge

27
28 Dated July 6, 2021.